

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Encana Oil & Gas (USA) Inc.
370 17th Street, Suite 1700
Denver, Colorado 80202**

ATTENTION:

**Sarah Schroeder
NRBU EHS Air Permitting Specialist**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Encana Oil & Gas (USA) Inc. ("Encana" or "you") to submit certain information about three of its facilities in Michigan: "Beaver Creek," King Road, Grayling, Michigan; "Garfield," 13500 Naples Road SE, Fife Lake, Michigan; and "Excelsior," 7999 Sunset Trail NE, Kalkaska, Michigan. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 days of your receipt of this information request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Encana owns and operates emission sources at its Grayling, Fife Lake, and Kalkaska, Michigan, facilities. We are requesting this information to determine whether your emission sources are complying with the CAA, the Michigan State Implementation Plan, the New Source Performance Standards, and the National Emissions Standards for Hazardous Air Pollutants.

Encana must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Encana must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

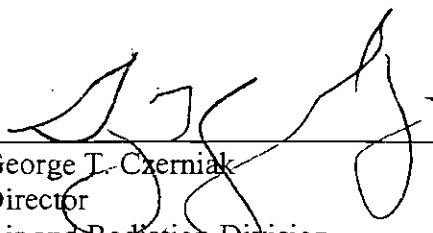
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Encana to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Bonnie Bush at 312.353.6684.

Date

3/4/14


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide the submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

You must submit the information requested below for each of your facilities at King Road, Grayling, Michigan (Beaver Creek), State Registration Number (SRN) P0435; 13500 Naples Road SE, Fife Lake, Michigan (Garfield), SRN P0433; and 7999 Sunset Trail NE, Kalkaska, Michigan (Excelsior), SRN P0278; pursuant to Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a). Submit all records for the period from startup of the facility to the present.

Records for Glycol Dehydrator Systems

1. Monthly records of the glycol recirculation rate for each glycol dehydrator system;
2. Monthly volatile organic compound (VOC) emission rates in pounds for each glycol dehydrator system and the most recent gas analysis data;
3. Provide a sample calculation of the VOC emission rate;
4. Any and all wet gas sampling records of wet gas composition from each glycol dehydrator system; and
5. Monthly records of all hours during which natural gas was processed while the enclosed flare pilot flame was extinguished.

Records for Engines

6. A copy of the approved preventive maintenance/malfunction abatement plan;
7. Maintenance logs of all the maintenance activities conducted for each engine at each site;
8. Monthly records of nitrogen oxide (NO_x) and carbon monoxide (CO) emissions reported in tons or pounds of pollutant; and
9. Monthly fuel use records for each engine.

Records for Condensate Tanks

10. Diagrams that include the following: each storage and/or product tank, its identification number or name, capacity, material stored, and identification of each vent (e.g. pressure relief, conservation, thief hatch, closed vent system);
11. Identify any and all air pollution control devices that are used to control emissions from the condensate tanks;
12. Monthly VOC emission calculations for each of the storage tanks at each site. VOC emissions shall include, but are not limited to, emissions from flashing, tank breathing losses, and tank working losses; and

13. Monthly throughput records for all condensate tanks at each site.

Records for Natural Gas-fired Burners

14. Hours of operation and percent load at each burner; and

15. Monthly fuel use records for each burner.

Records for Flares and/or Combustors

16. Provide all operating records for each flare at each site, including but not limited to, operating temperature, hours when flare was not operating, and hours when pilot flame was extinguished;

17. Provide a narrative description of the purpose and function of the flare;

18. Provide a detailed, labeled, flow diagram of all streams routed to the flare;

19. Provide the manufacturers' design specifications for each flare and/or combustor at each site;

20. Provide any flare and/or combustor operation and maintenance plan for each site; and

21. Identify the primary and any other fuel used to fire each flare and/or combustor at each site.

You must submit the following additional information for Beaver Creek and Garfield:

Records for New Source Performance Standards Subpart OOOO

22. Initial notification required by 40 C.F.R. 60.5410(a)(1) and 60.5420(a)(2);

23. Record log required by 40 C.F.R. 60.5410(a)(3) and 60.5420(c)(1);

24. Emission rate for VOC emissions from storage vessels you calculated pursuant to 40 C.F.R. 60.5410(h)(1);

25. Records for all pneumatic controllers required by 40 C.F.R. 60.5420(c)(4)(i)-(v);

26. Records for all storage vessels required by 40 C.F.R. 60.5420(c)(5)(i)-(v);

27. Any and all closed vent system inspection records required by 40 C.F.R. 60.5420(c)(6); and

28. Any and all cover inspection records required by 40 C.F.R. 60.5420(c)(7).

You must submit the following additional information for Excelsior:

29. 12-month rolling time period emission calculations of NO_x and CO;
30. Calculated VOC emission rates from the glycol dehydrator for each 12-month rolling time period;
31. 12-month rolling time period records of the hours in which natural gas was processed while the enclosed flare pilot flame was extinguished;
32. 12-month rolling time period records of the fuel use for the burners;
33. 12-month rolling time period records for the condensate tanks for throughput and VOC calculations;
34. Annual actual benzene emissions from the glycol dehydrators in megagrams, with supporting calculations; and
35. Actual annual average natural gas flow rate through the glycol dehydrators in cubic meters per day.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

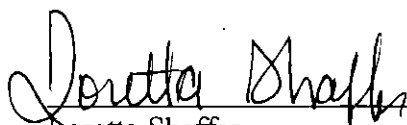
Sarah Schroeder, NRBU EHS Air Permitting Specialist
Encana Oil & Gas (USA) Inc.
370 17th Street, Suite 1700
Denver, Colorado 80202

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Janis Denman, Supervisor
Michigan Department of Environmental Quality
Cadillac District Office
120 West Chapin Street
Cadillac, Michigan 49601-2158

Thomas Hess, Enforcement Unit Chief
Michigan Department of Environmental Quality
Air Quality Division, Enforcement Unit
Constitution Hall, 3rd Floor North Tower
525 West Allegan
Lansing, Michigan 48933-1502

On the 6 day of March 2014.


Loretta Shaffer
AECAB, Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7670 0412